

# Labour Management Procedures

Sudan SOMOUD Enhancing Community Resilience  
Project – Component 2 (P181490)



World Food  
Programme

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## Annexes

Annex 1 – Indicative staffing plan – WFP

Annex 2 - Executive Director’s Circular of 2<sup>nd</sup> Feb 2016 WFP’s Policy on Occupational Health and Safety

Annex 3 - UN Staff Regulations and Rules manual

Annex 4 - UN Supplier Code of Conduct

Annex 5 – English translation of Labour Act of Sudan 1997

## Acronyms

CBO	Community Based Organisation
CO	Country Office
CP	Co-operating Partner
E&S	Environment and Social
ESS	Environmental and Social Safeguards
FO	Farmer Organisations
FLA	Field Level Agreement
IDP	Internally Displaced Persons
LMP	Labour Management Procedures
MC	Mercy Corps
OHS	Occupational Health and Safety
RSF	Rapid Support Forces
SAF	Sudanese Armed Forces
SIA	Social Impact Assessment
SME	Small and Medium Sized Entity
SMP	Security Management Plan
UN	United Nations
UNDSS	UN Department of Safety and Security
WFP	World Food Programme

# 1 Introduction

The World Bank’s Environmental and Social Review Summary of May 2023 classified the Somoud project as high risk (social risks) due to the ongoing conflict in Sudan. Specific risks related to labour and working conditions were identified:

- Child labour;
- Working conditions and Occupational Health and Safety (OHS);
- Forced labour;
- Discrimination.

This Labour Management Procedures instrument is a disbursement requirement within the Environmental and Social Commitment Plan (ESCP), under ESS 2. The ESCP states that the LMP should describe provisions on working conditions, management of workers’ relationships, occupational health and safety (OHS), emergency preparedness and response, code of conduct (including relating to GBV/SEA/SH), forced labour, child labour, and a Grievance Redress Mechanism for project workers.

The objective of this LMP is to set out the range of project workers engaged on this project, and the different risks and mitigation measures relating to these different categories of project workers. It sets out the policy and legal frameworks relating to the different categories of workers, and explains the process of contractor management. It sets out specific approaches to child labour, and how the project’s Grievance Redress Mechanism is relevant to the different categories of project workers. This LMP draws on the World Bank LMP template (Sept 2018). This LMP is part of a suite of Environmental and Social Safeguard Instruments, and where relevant cross-references to other documents to avoid duplication and confusion among documents. Plans for Emergency Preparedness and Response are covered in detail in the Security Management Plan, and thus are not covered here.

## 1.1 Project components

The WFP component of Somoud will finance goods, matching grants, consulting and non-consulting services, and operating costs. It will help achieve the second project outcome by supporting: (i) improvement of agricultural production of strategic crops; (ii) enhancement of agricultural value chains; and (iii) scale-up and strengthening of consumer co-operatives to achieve the provision of affordable food items. The component will be implemented by WFP through NGOs and CSOs that are actively engaged in these thematic areas.

Increasing agricultural production and resilience: The project will support the delivery of productivity packages of equipment and services to be provided with in-kind support. This sub-component will support the delivery of climate-smart agricultural and veterinary services, inputs (improved seeds, fertilizers (urea and DAP), and planting machinery), services (post-harvest technologies and rehabilitation of irrigation channels with solar-powered systems), and technical assistance to selected farmers associations. The target is to reach 20,000 smallholder farmers households, and the sub-component will cost up to 32,370,000 US\$ in direct services to beneficiaries.

Supporting value addition in agricultural value chains. This sub-component will provide matching grants (“Matching Grants”) to Small and Medium Enterprises (SMEs) to enhance value addition in agricultural value chains around services for instance, transport and logistics including storage and packaging, and small-scale processing. The target is to reach at least 100 SMEs, where each will be supported with a Matching Grant up to a maximum of 100,000 US\$. This sub-component will be totally implemented through the Implementing Partner, costing up to 8,000,000 US\$ in Matching Grants.

Scale-up and strengthening of consumer co-operatives: This sub-component will support community consumer cooperatives food centres through (a) provision of in-kind support including procurement of goods and services; (b) training in inventory management, value addition for agricultural products, and eco-friendly practices; and (c) procurement of renewable energy systems and clean cooking equipment; and (d) scaling up a digital enrolment platform in the community consumer cooperatives and food centres. The target is to reach 20 consumer cooperatives, costing up to 1,904,000 US\$ in services to beneficiaries.

## 2 Overview of Labour Use on the Project

The following table sets out the different forms of labour (project workers) involved in the SOMOUD project.

<p><b>DIRECT WORKERS</b> people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project</p> <p><i>Direct contract employed relationship</i></p>	<p>Staff at WFP working on this project: see Annex 1 for indicative organogram. The project will be led by a full time Project Manager (international), who will be supported by a team of 25 staff (17 national and 8 international, of whom 10 will be 100% working on the project and 15 will be shared roles.</p>
<p><b>CONTRACTED WORKERS</b> people employed or engaged through third parties<sup>3</sup> to perform work related to core functions<sup>4</sup> of the project, regardless of location</p> <p><i>Third party has direct contracted relationship</i></p>	<p>Mercy Corps (MC) have been identified as the Co-operating Partner (CP) for this project, although the contract with MC is not yet finalised. Thus contracted workers include staff at MC working on this project. MC will share an indicative staffing plan once the final decisions are made concerning project design.</p> <p>MC may select one or more local Community Based Organisations (CBOs), to deliver activities. However, these partnerships are not yet confirmed or contracted, and thus the LMP will be later updated with information for any relevant CBOs if this is confirmed.</p>
<p><b>PRIMARY SUPPLY WORKERS</b> people employed or engaged by the Borrower’s primary suppliers</p> <p><i>Primary supplier has contracted relationship</i></p>	<p>Local Small and Medium Sized enterprises (SMEs) providing inputs to farmers will be contracted through competitive tendering processes managed by WFP. These are expected to include:</p> <ul style="list-style-type: none"> <li>• Seed suppliers</li> <li>• Machinery and equipment for agricultural production</li> <li>• Transporters and aggregators</li> </ul>

	<ul style="list-style-type: none"> <li>• Production of silos</li> <li>• Provider of digital platform</li> </ul>
<p><b>COMMUNITY WORKERS</b> people employed or engaged in providing community labour</p>	<p>Post harvest and food processing SMEs will be provided with cash grants to enhance production. They have existing staff and may hire additional people. (see note below)</p> <p>Consumer cooperatives will be formed, who will engage in bulk purchasing and passing on reduced costs to consumer co-operative members. Community members will be required to manage these cooperatives.</p>

NOTE: The categorisation of post harvest / food processing SMEs as a Community workers (rather than as primary suppliers) is based on these services being specific targets of the project – i.e. to enhance and expand their services (rather than simply to use them as suppliers), which is reflected in the contractual relationships with these SMEs as grant recipients, rather than as vendors. This represents a significantly different relationship than with the SMEs that are primary suppliers.

### 3 Assessment of key potential labour risks

The following table sets out identified risks, and proposed mitigation and monitoring measures concerning labour and working conditions.

Risk title	Risk description	Mitigation measure	Monitoring measures
War spreads into programme operational area creating physical safety and security risks for staff, contractors, and everyone	While the programme states have been chosen in locations of relative calm, there is a risk that the war between RSF and SAF expands into these areas. This would put everyone at risk of violence.	Please see Somoud Security Management Plan (SMP)	UNDSS threat monitoring  Security Community of Practice convened for this project provide ongoing monitoring through bi-weekly meetings
Sexual and Gender Based Violence at work	Risk of violence against particularly women community workers in the workplace (SMEs or consumer co-operatives)) committed by staff of supported SMEs or other consumer cooperative members	Please see separate GBV/SEA/SH Action Plan	Please see separate GBV/SEA/SH Action Plan
Sexual Exploitation and Abuse of beneficiaries	Risk of sexual abuse or harassment by WFP staff or partners (MC/CBOs)	Please see separate GBV/SEA/SH Action Plan	Please see separate GBV/SEA/SH Action Plan
Discrimination and exploitation of women and other vulnerable groups	Risk of exclusion of women from labour force, or of unequal pay for women compared to men  Risk of exclusion of marginalised groups from the workforce  Phase 2 social assessment identified women accessing work opportunities in food	Post harvest and food processing SMEs: The grant agreement will be conditional on commitment to pay women equal to men's and non discrimination in recruitment. Payments to staff will be costed elements of financial proposals.	Phase 2 SA research completed with specific section on women in the workforce.  Compiled set of standard contracts signed with all FOs and SMEs, within



	<p>processing SMEs, and receiving equal pay to men.</p>	<p>The grant evaluation criteria will provide additional points awarded for SMEs with women in the workforce</p> <p>Awareness raising activities with SMEs management on non-discrimination (women / ethnicity)</p>	<p>Environmental and Social (E&amp;S) reporting)</p> <p>Spot checks will be undertaken across agricultural labourers and grant-supported SMEs to identify possible acts of discrimination and exploitation</p>
<p>Risk of reinforcing women’s limited roles in value chain</p>	<p>There are significant cultural controls of what is ‘acceptable’ women’s work. Tribal identity plays an important role as certain tribes are significantly more controlling of women’s rights and freedoms compared to others.</p> <p>These create major constraints on women’s economic empowerment. If the project works within these confines it risks reinforcing this structural violence against women.</p> <p>Phase 2 social assessment identified some modest evolution on gendered divisions of labour in value chains</p>	<p>From among the SMEs receiving grant support, a minimum number will be set for awards to SMEs led by women, with affirmative action where needed to enable this (for instance working with smaller SMEs / adding skills building components)</p> <p>The grant evaluation criteria will provide additional points awarded for SMEs with women in the workforce</p> <p>Grant agreements will include provisions for affirmative action for women within the workplace</p> <p>Awareness raising sessions will be convened to challenge cultural norms, specifically targeting opinion formers in the community</p>	<p>Phase 2 SA research completed with specific section on women in the workforce.</p> <p>Specific learning questions will be integrated into the MEAL system to capture lessons learned in what works in challenging cultural constraints on women’s economic empowerment</p> <p>Number of women’s-led SMEs supported, and additional support provided documented in E&amp;S reports</p>





		Successful women’s-led SMEs to be identified, with women leadership who are challenging existing roles to come and speak to business community and share experiences.	Grant agreement templates show affirmative action for women  Awareness raising sessions completed documented in E&S reporting
Risk of creating a backlash against women through challenging limitations on women’s roles in value chains	Related to the above, by challenging cultural norms there may be backlash against vanguard women / businesses  Phase 2 social assessment did not identify a backlash against women challenging limitations on roles within value chains, but this issue remains of concern	Awareness raising sessions will be convened to challenge cultural norms, specifically targeting opinion formers and men more broadly in the community	The monitoring system will monitor for unintended consequences, with a specific focus on possible backlash  The GRM will be established, and awareness raising activities will promote it to community members  Awareness raising sessions completed and documented in E&S reporting
Risk of injury or death to manual labourers	Manual labour in the project includes small scale irrigation infrastructure and carrying and processing of agricultural products. These carry risks of injury or possibly even death.	Health and safety briefings will be given to grant-supported SMEs, consumer co-operatives and FOs, where community labour is involved in small scale infrastructure works or small scale processing	Monitoring visits to grant supported SMEs during project implementation by MC and WFP field teams to confirm application of OHS measures.



		To prevent accidents in the SME agricultural product processing facilities, health and safety at the facilities will be assessed through a site check of shortlisted SMEs, which will inform grant decisions. To prevent accidents in consumer co-operatives, site visits will be made to any processing sites, health and safety will be assessed through a site check, leading into mitigation measures	Completed SME & consumer co-operative site visit checklists covering OHS issues  OHS complaints received through GRM, and case investigation, follow up and closure.
Risk of injury or death through transport	Staff, contractors, community workers and primary suppliers will all need to move to project sites, including some vehicles specifically procured by and for the project. There is a risk of accidents during movement.	For staff and contractors moving to/from and within the project areas, the security community of practice will determine if specific protocols are needed and establish these.	Spot checks by MC and WFP on use of, and maintenance of, vehicles.
Risk of injury or death through transport	Some heavy agricultural machinery – such as tractors – may be purchased for FOs (TBD)	For vehicles procured by and for this project (including tractors) these will be well maintained by the FOs, and will only be operated by those trained to do so. This will form part of the standard contract with the FOs	Maintenance logs for agricultural machinery will be established and subject to spot checks
Risk of engaging child labour	Internally Displaced Persons (IDPs) that fled Khartoum and now also Wad Medani may have lost their national identity (ID) cards, contributing to further vulnerability. This makes it hard to verify age and heightens the risk of child labour.	Where people hold national ID cards these can be used to verify age. Where age cannot be verified, individuals will be asked their age / date of birth.	Records of community workers, including age / date of birth, engaged in the project in SMEs and consumer co-operatives



		<p>In all cases, name / date of birth / gender is to be recorded by SMEs, and this information to be shared with project team.</p> <p>Training to be provided on prohibited practices (child / forced labour) to all groups (FOs, SMEs and consumer co-operatives</p> <p>Records of community workers regularly reviewed, along with their age. Any underage community labour will be flagged to the consumer co-operative for action.</p>	<p>Spot checks at SMEs will include checking on age, and if child labour if found this will result in suspension.</p>
<p>Risk of agro-chemicals causing health impacts</p>	<p>Pesticides will not be supplied by the project, but other agro-chemicals (fertilisers) may be.</p> <p>Misuse of agro-chemicals have the potential to pollute water, air and soils</p> <p>Application of the wrong agro-chemicals or incorrect quantities can affect harvests</p> <p>Agro-chemicals can affect human health if misused or applied without personal protective equipment</p>	<p>The Integrated Pest Management Plan sets out provisions on handling agro-chemicals</p> <p>Provide information and training on acceptable and unacceptable pesticides to farmers</p> <p>Encourage farmers to comply with WFP policy and international standards of pesticide use, storage and disposal</p> <p>Encourage the use organic fertilizers</p> <p>Put in place facilities for the storage of agrochemicals</p>	<p>Awareness raising sessions completed and documented in E&amp;S reporting</p> <p>Facilities for storage of agrochemicals put in place</p> <p>Monitoring visits to FOs during project implementation by MC and WFP visibly observe handling of agro-chemicals</p>



		Carry out training and awareness raising on the proper application of agro-chemicals	
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Note: Forced labour was considered but not found to be a relevant concern for this project. Similarly the scale of the project was not considered significant enough to create risks of influx of labour, and thus risk of spread of disease through labour influx was also considered not proportionate to the scale of this project.

## 4 Brief overview of labour-related policies and procedures

The national Labour Act of Sudan (1997) are translated and annexed at Annex 5.

### 4.1 Direct workers

As an international organisation, WFP has developed a set of global policies and procedures for labour management and working conditions, including for wages, deductions and benefits, and for occupational health and safety. These will be described here. WFP's policies and procedures are described in the FAO Staff Rules and Regulations, WFP Human Resources Manual, WFP Occupational Health and Safety Policy. The FAO regulations, which underpin WFP's regulations and policies, are in compliance with ILO standards.

WFP has three different categories of staff:

- Fixed term (indefinite contract) – which can be internationally or nationally recruited long-term staff;
- Consultants/STP (temporary contracts of up to 11 months) – to provide specific technical competencies not normally available among fixed term staff;
- Service Contract or Special Service Agreement or Casual Labour – for short term services to be hired in the locality – national short-term employees.

#### 4.1.1 Wages, deductions, benefits

Standardized salary scales and benefits are applied to different categories of workers employed under similar contracts. The salary scale for international staff is set out in the International Civil Service Salary Commission: <https://icsc.un.org/Home/SalaryScales>. Benefits are outlined in the WFP Human Resources Manual. For national staff the local salary scales, benefits and entitlements are outlined in WFP's staff handbook. If salaries and benefits for national staff fell below the national minimum wage then WFP would increase to match that minimum. Deductions are made for contributions to medical services, amounting to between 1-5% of salary.

#### 4.1.2 Occupational health and safety

WFP has an Occupation Health and Safety (OHS) Standard Operating Principle, as set out in the Executive Director's Circular of 2<sup>nd</sup> Feb 2016 WFP's Policy on Occupational Health and Safety which is included at Annex 2. WFP's occupational health and safety policy applies to all categories of its employees and forms part of an OSH management system, comprising of:

- Advisory Committee on Occupational Safety and Health – the OSH oversight body in WFP;
- OSH 2016 Policy;
- Risk Management , with templates for Risk Assessment and Risk Register;
- Incident Reporting System and Fact Finding Process;
- OSH standards and guidance, in particular in relation to elevated work, housekeeping and forklift safety;
- OSH Compliance mechanism and internal audit;
- Capacity Building.

WFP must also comply with the UN Security Management System Guidance on Occupational Health and Safety, and WFP also follows international standards on OSH ISO 45001. All employees are provided coverage against service incurred injuries and compensation as detailed in the UN Staff Regulations and Rules manual for each category of employees (enclosed in Annex 3).

## 4.2 Contracted workers

Similar to above, as a global organisation, WFP has a global set of policies and procedures for working with CPs, which are captured in a Field Level Agreement (FLA), the contract between WFP and the Co-operating Partner. The FLA includes a set of standard requirements for all CP contracts, which includes commitments to WFP's Environmental and Social Standards, including WFP's Policy on Occupational Safety and Health (2016) for contracted workers, as well as a commitment to the implementation and reporting on the ESCP, ESMF, including the LMP.

Mercy Corps has established specific criteria distinguishing between Independent Contractors and Mercy Corps employees. Independent Contractors are vendors and are not Mercy Corps employees. An Independent Contractor is an individual who provides professional services or expert advice for a fee and is self-employed (i.e. not an employee of a firm). Independent Contractor relationships are significantly different from employment relationships. They are subject to different taxation rules and are not eligible to receive Mercy Corps employee benefits. All Independent Contractors are subject to Mercy Corps' Code of Conduct and the policies that are associated with the Code of Conduct. These policies are incorporated into Mercy Corps' standard Independent Contractor agreements.

Because the determination conveys important legal and administrative distinctions, the authority to determine whether an individual may be engaged as an Independent Contractor or may be hired as an employee rests with MC Global Human Resources (or MCE Human Resources for Independent Contractors contracted by MC Europe/MC Netherlands).

### 4.2.1 Wages, deductions, benefits

Mercy Corps Sudan implements labour policies that align with the laws of the host country. These policies ensure compliance and adherence to local regulations. The organization has a comprehensive staff handbook that covers various aspects, including employee salaries, benefits, and deductions mandated by the government.

#### **Salaries:**

Mercy Corps Sudan offers a highly competitive scale to attract and retain the right talent. Mercy Corps Sudan has a well-defined salary scale that is categorized into four levels: Directors, senior managers, programs and strategy implementers, and support staff. The support staff category further consists of levels A to D, while the remaining levels range from assistant level to country director level starts from 1 to 10. Each level within the salary scale is defined by percentiles, starting from the entry-level and progressing through the 10th, 25th, 33rd, 50th, 75th percentiles, and finally reaching the maximum. New hires are initially placed at the entry-level, but there is flexibility for placement in other steps based on specific criteria. The release of staff salaries occurs on the 25th day of every month.

#### **Deductions:**

Mercy Corps Sudan ensures compliance with Sudanese laws and regulations, including the deduction of income tax from staff gross salaries, as required by the country's tax thresholds. These deductions are carried out in accordance with the relevant categories specified by Sudanese laws.

### **Income Taxes**

Employees are responsible for paying their income tax according to the taxation brackets and percentages specified by the Government of Sudan's Taxation Chamber Personal Income Tax Laws. Mercy Corps automatically deducts the taxes through the monthly payroll and remit to the Sudan chamber of taxation. The tax figures may change without notices whenever the taxation of chamber changes their calculation brackets and rates.

### **Social Insurance**

Team members are responsible for paying their monthly 8% social insurance as dictated by the Government of Sudan from the gross salary and MC withholds and deposits to national insurance scheme (NSI) with employer's share. This will be 17% of the gross salary, which will be paid by Mercy Corps. Total amount of 25% of gross salary will be sent to National Social Insurance Fund (NSIF) according to Social Insurance Act 2016. These deductions are itemized in the pay-slip.

### **Zakat**

Mercy Corps Sudan directly deducts monthly 2.5% of the employee's gross salary to pay directly to the Zakat office according to Zakat law 2001 Act 35. Team members are responsible for paying their income taxes, social insurance and Zakat as dictated by the government of Sudan. Mercy Corps Sudan will withhold and remit the appropriate statutory income tax, social insurance, Zakat payments according to the laws and tax codes of Sudan. These deductions are itemized in the payslip.

### **Non-Standard Deductions**

During employment at Mercy Corps Sudan, it may be necessary for Mercy Corps to receive reimbursement for amounts owed by a team member to Mercy Corps. This amount can be deducted from the payment of the team member's wages and/or benefits. In addition, Mercy Corps may deduct from the team member's salary an determined as a result of any disciplinary action(s), according to the Sudan labor law.

### **Staff benefits**

In addition to competitive salaries, Mercy Corps Sudan also offers a range of benefits to its staff, which are designed to enhance staff retention and satisfaction. These benefits include both cash and in-kind benefits, covering areas such as medical insurance, vacation/annual leave, paid sick leave, maternity leave, paternity leave, caregiver leave, Idda leave, pilgrimage leave, social insurance, Ramadan & Eid bonus, bereavement leave, and new hire and reassignment relocation allowance.

\*The information detailed above is available in the Mercy Corps Sudan staff handbook.

#### *4.2.2 Occupational Health and Safety*

**Risk Assessments:** Mercy Corps conducts thorough risk assessments to identify potential hazards in the workplace. Our assessments include assessing risks associated with the physical environment, such as the structural integrity of buildings, security risks in the environment and risks related to the nature of the work being performed.

**Training and Awareness:** Mercy Corps provides comprehensive training to staff on OHS practices and procedures. This includes training on safe work practices, and emergency procedures (Hostile Environment Awareness Training, First Aid, etc.,)

**PPE Provision:** Mercy Corps ensures that appropriate personal protective equipment is available and utilized where necessary. Depending on the specific risks present in the work environment this includes items such as helmets, gloves, and high-visibility clothing.

**Health and Wellness:** Mercy Corps provides access to medical care, mental health support, and resources for managing stress.

**Emergency Preparedness:** Mercy Corps regularly updates our safety protocols and emergency response plans to address potential crises or incidents.

### 4.3 Primary supplier workers

WFP will procure inputs for farmers including seeds, machinery and equipment, and a digital platform serving farmers and consumer co-operatives. This will follow WFP's procurement policy and the UN Supplier Code of Conduct (enclosed in Annex 4) will be used for primary suppliers. Of particular relevance to both wages, deductions and benefits, and occupational health and safety are:

- Terms and conditions in tendered contracts which include applying UN standards relating to the supply chain, which include a clause for health and safety of workers, including personal protective equipment, and insurance for workers;
- Market intelligence - in which procurement staff will seek to understand about the product, its availability, and its source.

The use of child labour will be prohibited among primary supply workers, and this will be set out in the contractual agreement – not only as an annex but also as specific conditions within the contract. If a grievance / incident report is raised concerning the use of child labour at a primary supplier, WFP will refer the issue to the supplier for prompt investigation and action, reporting findings and action to WFP. WFP will determine if the matter is resolved or further escalation is required, including possibility to seek alternative supplier.

### 4.4. Community Workers

The project will involve community workers in the form of food aggregating / processing SMEs that are supported through grants, and through consumer co-operatives.

Food processing SMEs receiving grants – Grant agreements with SMEs will include specific provisions relating to recruitment, pay and conditions of workers. Information will be provided to the staff of SMEs to inform them of the standard arrangements through posters displayed at the SMEs and leaflets provided to SMEs, as well as through any OHS briefings provided at the SME. Spot checks will be made by MC and WFP.

Consumer co-operatives - Members of consumer co-operatives will not receive pay, but will receive benefits of cheaper food products. Assessing access to these benefits will form part of the project monitoring framework.



All community workers will be provided with information on the GRM, which is described in detail in the stakeholder engagement plan. Complaints relating to wages, deductions, benefits and discrimination will be investigated, including through spot checks. Occupational Health and Safety is identified as a risk in section 3 Assessment of key potential labour risks. A range of mitigation measures are set out in the table (please refer to the table).

## 5 Responsible staff

The responsible staff for implementation of these Labour Management Procedures are as follows:

<b>Responsibility</b>	<b>Role</b>
Overall compliance with LMP	Social Safeguards Specialist - WFP
Oversight of implementation of LMP at state level	Environmental and Social Safeguards Focal Point - Kassala hub (covering Northern, River Nile and Kassala States) - WFP
Direct workers - Addressing worker grievances, Occupational Health and safety	Human Resources - WFP
Contract workers - Addressing worker grievances, Occupational Health and safety	Human Resources – MC
Primary supply workers - Occupational Health and safety	Procurement – MC and WFP
Community workers - Addressing worker grievances, Occupational Health and safety	MC field teams WFP GRM

## 6 Monitoring and reporting

Occupational Health and Safety risks for community workers in food aggregating and processing SMEs will be reviewed as part of the matching grant application (for SME value chain actors provided with grants through the project). As part of the business capacity assessment process for selected SMEs, a site visit will be conducted (where SMEs are reachable), which will consider all possible environmental and social risks related to the SME, including OHS. This will be documented, and feed into the ESMP. During the two years of support to the SME, further visits will be made as part of wider monitoring processes (number of visits to be determined on basis of reach / geographical spread), and OHS will form part of the these site monitoring visits, and findings documented.

Reporting on implementation of mitigation measures in this LMP covering all forms of labour will form part of the regular bi-annual E&S reporting, as set out in the ESCP. At project start up, monitoring tools for E&S risk management monitoring tools will be developed to feed into the E&S reporting, which can work alongside existing Post Distribution Monitoring tools. Said reporting will cover the contents consistent with the ESCP regarding all the participating actors.

MC will investigate, address and report to WFP any occupational health and safety incidents resulting in injury or death, or that breach commitments in the LMP. WFP will review the case, and escalate to the World Bank as required in the ESCP.

## 7 Age of employment

The minimum age for employment under WB ESS 2 is 14. Sudan Labour Act (1997) defines an ‘infant’ as anyone under 16 years old. The Labour Act identifies restrictions on employment of ‘infants’ including not to carry heavy weights, or maintenance of machinery. It notes that ‘infants’ under the age of 12 should not be employed other than in exceptional circumstances that fall outside the remit of the project. Thus for the purpose of this project the minimum age of employment shall be 14, with restrictions on anyone aged 14-16 to not carry heavy weights or maintain machinery. Anyone aged 14-18 may be employed or engaged in connection with this project only under the following conditions:

1. The work is not hazardous, interfere with the child’s education, or be harmful to the child (physical / mental health, spiritually, moral or social development)
2. A risk assessment is conducted prior to the child starting work;
3. Regular monitoring is made of health, working conditions hours of work and wider environmental and social safeguarding.

In the current context of Sudan, some IDPs who fled Khartoum / Jazeira will not have national identity documents, as these were lost in flight. It is worth noting that prior to April 2023 while the majority of people held a national ID, not all people did. This can create difficulties for proving age. Ensuring that someone is over the minimum age for employment will be achieved through:

For Direct and contracted workers all are assumed to have identity documents, age is verified through identity checks during hiring processes.

For Primary supply workers this will be established through the specific Child Labour Clause in the contractual agreement.

For community workers hired by grant-supported SMEs, where there is no national ID, labourers will be asked for their date of birth, their national ID (if they have it) and spot checks will include inquiries on age. The commitment on not using child labour will be included in the grant agreement for SMEs, and in standard contract with FOs, with a clear stipulation that the use of child labour (below 14) is prohibited. If a grievance / incident report is raised concerning the use of child labour at a grant-supported, WFP will refer the issue to the SME for prompt investigation and action, reporting findings and action to WFP. WFP will determine if the matter is resolved or further escalation is required, including possibility to suspend support to the SME.

Site visits when selecting SMEs from the shortlist will determine if there are workers present under 14, and subsequent monitoring visits will assess this also.

NOTE: It is generally understood that children often contribute and support family members on family farms. The specific concern is the employment of children. Awareness raising will be integrated into ESS trainings the children supporting family farms should have non-hazardous working conditions, and their work on a family farm should not interfere with school attendance.

## 8 Grievance mechanism

Within WFP there are a range of mechanisms direct workers can use to raise grievances. These include:

- Human Resources – at CO level, who can make determinations on specific issues.
- WFP staff relations- who can guide managers relating to grievances and disciplinary matters;
- Office of Investigations – receives and investigates complaints in a confidential manner;
- Office of the Ombudsman – for confidential discussion.

The Mercy Corps internal grievance mechanisms are as follows:

- The HR representative at the specified office can receive staff grievances either verbally or in writing. In the event of a verbal grievance, HR must document it and obtain confirmation from the team member.
- HR Manager or HR Coordinator is responsible for guiding managers on grievances and disciplinary matters, as well as conducting investigations.
- Cases related to safeguarding, the HR team will transfer the matter to the Ethics and Compliance team via the integrity hotline, as they are responsible for all safeguarding, fraud, and corruption issues.

For both WFP and MC staff, the Somoud project GRM will be available if needed. It is for staff to determine which GRM to select.

For Community Workers, the GRM is the key vehicle for grievance redress. The GRM is extensively documented in the Stakeholder Engagement Plan and will not be replicated here.

WFP does not expect to handle grievances from primary suppliers, so will not conduct outreach to labour within primary suppliers.

## 9 Contractor management

### 9.1 Selection

WFP has global corporate guidance for CP selection, as set out in WFP Management of NGO Partnerships and Corporate Guidance on NGO Partnership Management. As part of its internal partnership management process, WFP regularly conducts partner mapping and analysis to identify and determine potential partner organizations, their availability and eligibility, along with their capacity to deliver on specific programmes. The mapping is done in close consultation with relevant Clusters. Selection of Cooperating Partners (NGOs) is done through a competitive process. WFP assesses possible partnerships through a Call for Proposals. Potential partners are then invited to submit their applications which are reviewed to determine sufficient capacity for the project under interest. All submissions undergo a technical review for programmatic, logistical, and financial solvency and NGOs that meet the criteria are shortlisted and put on a roster, which is regularly updated. As and when required, shortlisted NGOs are invited to submit full proposals that also undergo a competitive process based on a technical review with recommended proposal(s) presented to the Cooperating Partner Committee (CPC) which is comprised of representatives from

different units. The CPC acts as a neutral body, levying checks and balances on the verification processes and ensures country office-level processes and corporate requirements are followed.

For the Somoud project, WFP has selected Mercy Corps as the Co-operating Partner. A direct selection process was used given the timeframe, which followed WFP procedures for accelerated processes: in November 2023 the Programme Technical Team identified 11 potential partners, who were invited to a group meeting to discuss the project. All 11 agencies were invited to apply via written responses to a common set of questions, which were then scored. A different partner was selected at that point, but negotiations failed with that partner, and so the highest scoring agencies among the remaining 10 were invited to re-engage, and Mercy Corps scored the highest.

### *9.2 Contractual provisions for management of Labour issues and OHS*

As set out above at 4.2, the flow down of obligations to the CP MC is established through the FLA, which includes reference to the ESS framework of WFP. The FLA with MC will also include salaries set out in the budget, and WFP will verify these against transfers. However, WFP does not engage in labour management issues within MC, such as wage bargaining, as this is an internal matter to MC.

### *9.3 Performance management*

The FLA establishes the expected qualified personnel put forward by the CP for the implementation of the work. As the project shifts into implementation, awareness raising / capacity building activities will be undertaken with MC and any local partners to ensure strong understanding of commitments under the ESMF, including OHS.

There are regular meetings between field offices and CPs – performance management meetings – to help identify and address issues in real time. CPs are annually assessed for performance, which includes performance against OHS, among many other topics. On OHS this includes performance against policies, staffing and resource, and accidents / injuries reported. If a CP scores unsatisfactory overall the contract could be suspended. For those identified as in need of improvement, capacity building will be provided, including in OHS if required. WFP field staff will accompany the CP during implementation, providing onsite supervisory support. Spot checks will also be undertaken as noted above.

### *9.4 Flow down to sub contractors*

Where MC contracts a sub-contractor on Somoud, MC remains responsible for all services and obligations performed by the sub contractor(s). The terms of the sub contract will be subject to, and construed in accordance with, the terms of conditions of the contract between WFP and MC. As such the sub-contractor will be integrated into the processes for ESS implementation and reporting, as set out in the ESMF.